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November 14, 2019

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
Thurgood Marshal Courthouse  
40 Foley Square  
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

*Paul G. Gardephe*  
Paul G. Gardephe, U.S.D.J.

Dated: *Nov. 14, 2019*

Letter Motion

RE: United States v. Tonya Thomas, et al., 19 Cr. 789 (PGG)

Your Honor:

I am writing to request a consent modification of the bail bond requirements for my client to permit her an extra eight days to locate a second co-signer on her bond.

My client is one of the numerous defendants in the case of United States v. Anthony Rose, et al., which will be before Your Honor tomorrow, November 15, 2019, for a status conference. She is charged only in the first count of the indictment, which is a violation of 18 U.S.C. § 371, which carries a maximum penalty of five years incarceration (plus supervised release, a fine, and a special assessment).

At the arraignment before Magistrate-Judge Gorenstein the government and the defense agreed to a bail package: that my client would be released on a \$50,000 personal recognizance bond to be co-signed by two financially-responsible persons, and other conditions (such as reporting to Pre-Trial Services, surrender of travel documents, and travel restrictions), the signing to be completed by today, November 14th.

Yesterday one co-signer was approved and has signed the bond, but at the

last minute the other person who had previously agreed to sign changed her mind, so we need some additional time to find another.

I have discussed this with AUSA Matthew Andrews and he has no objection to an extension of the signing deadline to November 22, 2019.

Thank you.

Sincerely,

/s/ Thomas H. Nooter  
Attorney for Defendant

cc: AUSA Matthew Andrews, by ECF  
Pre-Trial Services Officer Francesca Tessier-Miller, by email